

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

NANCY R., pseudonymously

Plaintiffs

vs.

**PLAZA HOTELS, LLC;
STEVE KETTER;
MICHAEL WILEY;
OKC AIRPORT ES, LLC;
ESH STRATEGIES FRANCHISE, LLC
KAJAL HOSPITALITY, INC;
JALIYAN HOSPITALITY, INC.
SUPER 8 WORLDWDE, INC;
RAJ KRUPA HOTEL, LLC;
DAYS INNS WORLDWIDE, INC;
CHAND & SAAJ HOSPITALITY, INC;
RAMADA WORLDWIDE, INC;
YASH ENTERPRISES, INC;
HOWARD JOHNSON
INTERNATIONAL, INC;
NOOR HOTEL, LLC;
AMBICA, LLC;
OM, LLC;
INDRA, LLC; AND
G6 HOSPITALITY FRANCHISING, LLC**

Defendants.

**Case No. CJ-2025-1850
Honorable Anthony Bonner**

**FILED IN DISTRICT COURT
OKLAHOMA COUNTY**

APR 15 2025

**RICK WARREN
COURT CLERK**

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SPECIAL ENTRY OF APPEARANCE

In accordance with 12 Okla. Stat. § 2005.2, the undersigned enters her appearance for Super 8 Worldwide, Inc., Days Inn Worldwide, Inc., Ramada Worldwide, Inc., and Howard Johnson International, Inc. These Defendants intend this to be a special appearance pursuant to *Campbell v. American International Group, Inc.*, 1999 OK CIV APP 37, ¶ 9, 976 P.2d 1102, and *Young v. Walton*, 1991 OK 20, ¶ 4, 807 P.2d 248. It is these Defendants' specific intent to enter a special appearance to preserve their rights to further proceed by way of motion for any defense



identified in 12 O.S. § 2012(B) or other statute, inclusive of any jurisdiction or standing challenges.

Respectfully submitted this 15th day of April 2025, by:

DOERNER, SAUNDERS, DANIEL
& ANDERSON, L.L.P.

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***Attorney for Defendants Super 8 Worldwide, Inc.,
Days Inn Worldwide, Inc., Ramada Worldwide,
Inc., and Howard Johnson International, Inc.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of April 2025, a true and correct copy of the above and foregoing pleading was mailed to:

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